Comments on Draft 1 Version 2.0 ENERGY STAR External Power Supplies Specification

Submitted by:

Tim Cassidy

SL Power Electronics Inc. (SLPE)

Date:

November 5, 2007

Comments:

Background:

Energy Star is proposing changes to the program for single output external PSUs. The changes are now circulating as Daft 1 for Version 2.0 of the program requirements. Below is a comparison chart showing the differences between Energy Star proposals and CEC "tier 2" and International "level IV." Key differences are in both categorization of nameplate ratings for criteria and actual limits for both active mode and no-load. Also, the Energy Star requirements are more stringent for all categories. Energy Star further proposes PFC requirements. Finally, Energy Star proposes different no-load requirements for transformers than for DC-PSUs.

Position Statement:

SLPE has advocated and continues to advocate for <u>harmonized</u> requirements globally to ease the burden on manufacturers. Since CEC is mandated for tier 2 implementation for July 2008, we would ask that Energy Star match the CEC requirements (incidentally, CEC and International are exactly in agreement).

SLPE requests that PFC requirement should be re-drafted to state compliance with IEC 61000-3-2 rather that 0.9PF. This would harmonize with international standards currently in use in the EU. Below Table 1, 2 and 3 is Table 4, 5 and 6 of SLPE recommended Energy Star Version 2.0 requirements.

| Table 1: Minimum Efficiency in Active Mode | | | | |
|---|-------------------------------|-------------------------------|---------------------------|--|
| Nameplate Output | CEC Tier 2 (July 1, 2008) | International Level IV | E-Star Proposed | |
| 0 to <u><</u> 1 watt | | 1 | ≥ 0.44*Pno + 0.145 | |
| < 1 watt | 0.5 * Nameplate Output | 0.5 * Nameplate Output | | |
| >1 to ≤ 36 watts | | 1 | ≥ [0.08 * In(Pno) + 0.585 | |
| ≥1 and < 51 watts | 0.09*In(Nameplate Output)+0.5 | 0.09*ln(Nameplate Output)+0.5 | | |
| > 36 watts | | 1 | <u>></u> 0.870 | |
| > 51 watts | <u>></u> 0.85 | ≥ 0.85 | | |
| Table 2: Minimum Power in No-Load Mode | | | | |
| Nameplate Output | CEC Tier 2 (July 1, 2008) | International Level IV | E-Star Proposed | |
| Any output | 0.5 watt | | | |
| 0 to < 10 watts | | < 0.5 watt | | |
| 10 to 250 watts | | < 0.5 watt | | |
| 0 to < 50 watts | | | ≤ 0.5 watt (AC-AC) | |
| | | | ≤ 0.3 watt (AC-DC) | |
| ≥ 50 to < 250 watt | | - | ≤ 0.5 watt (AC-AC) | |
| | | | < 0.5 watt (AC-DC) | |
| Table 3: Power Factor Correction | | | | |
| Nameplate Output | CEC Tier 2 (July 1, 2008) | International Level IV | E-Star Proposed | |
| ≤ 75 watts | NR | NR | 0.9 PF | |
| Table 4: Minimum Efficiency in Active Mode, SLPE Proposal | | | | |
| Nameplate Output | CEC Tier 2 (July 1, 2008) | International Level IV | E-Star 2.0 | |
| < 1 watt | 0.5 * Pno | 0.5 * Pno | 0.5 * Pno | |
| ≥1 and < 51 watts | 0.09*ln(Pno)+0.5 | 0.09*ln(Pno)+0.5 | 0.09*ln(Pno)+0.5 | |

| > 51 watts | <u>></u> 0.85 | <u>></u> 0.85 | <u>≥</u> 0.85 | |
|---|---------------------------|------------------------|---------------|--|
| Table 5: Minimum Power in No-Load Mode, SLPE Proposal | | | | |
| Nameplate Output | CEC Tier 2 (July 1, 2008) | International Level IV | E-Star2.0 | |
| Any output | 0.5 watt | 0.5 watt | 0.5 watt | |
| Table 6: Power Factor Correction, SLPE Proposal | | | | |
| Nameplate Output | CEC Tier 2 (July 1, 2008) | International Level IV | E-Star 2.0 | |
| ≤ 75 watts | NR | NR | IEC 61000-3-2 | |